

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
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Project Summary for an Application from
Full-Fill Industries for a
Federally Enforceable State Operating Permit (FESOP) for
400 North Main Street
Henning, Illinois 61848

Site Identification No.: 183040AAE
Application No.: 11120012

Illinois EPA Contacts

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I. INTRODUCTION

Full-Fill Industries has applied for a Federally Enforceable State Operating Permit (FESOP) for its manufacturing facility at 400 North Main Street in Henning. This facility requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the permit that it would propose to issue for the plant. However, before issuing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Full-Fill Industries manufactures cooking sprays for major brands and private labels. Spray cans are filled with vegetable oil from bulk storage at the filling line. From the filling line, the cans are sent to the Gas House where a hydrocarbon propellant is added that creates the aerosol spray action. When the propellant is added to the spray can a small amount of propellant is lost. This lost propellant is emitted to the atmosphere as a volatile organic material emission.

The propellants are stored in seven pressure storage tanks. The facility also has small natural gas fired boilers.

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Illinois Pollution Control Board has specific standards for units emitting volatile organic material. The specific standard for this company is 35 Ill. Adm. Code 215.301, which states no person shall cause or allow

the discharge of more than eight pounds per hour of organic material into the atmosphere from any emission source. However if there is no odor nuisance, this limitation shall only apply to photochemically reactive material. This source has emission limits in its permit that keep the amount of hazardous air pollutants below major levels. The application shows that the plant is in compliance with applicable state and federal emission standards.

V. CONTENTS OF THE PERMIT

This permit that the Illinois EPA is proposing to issue will identify the specific emission standards that apply to the emission units at the plant. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. (Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.)

The permit conditions require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for issuance of its permit. The Illinois EPA is therefore proposing to issue the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.